

395711

ORIGINAL  
(Reg)



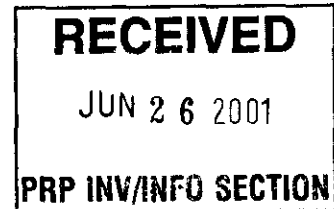
DuPont Legal

*Pamela Meitner, Esq.*  
DuPont Legal D-7099  
1007 Market Street  
Wilmington, DE 19898  
Phone: 302-774-8720  
FAX: 302-774-1189

June 18, 2001

**OVERNIGHT MAIL**

Mr. John Rajkowski (3HS11)  
U. S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2089



**Re: Lower Darby Creek Area Site**

Dear Mr. Rajkowski:

Attached is the response of E. I. du Pont de Nemours and Company ("DuPont") to the Request for Information for the Lower Darby Creek Area Site.

All future correspondence related to this site should be sent to:

Pamela Meitner, Esq.  
DuPont Legal, D-7099  
1007 Market Street  
Wilmington, DE 19898  
302.774.8720  
302.774.1189 (fax)  
[pamela.meitner@usa.dupont.com](mailto:pamela.meitner@usa.dupont.com)

DuPont understands its obligation to supplement this response should additional information become available. We request that the Agency notify me if it receives information that purports to link DuPont-sourced waste to this site.

Very truly yours,

Pamela Meitner

Attachment

ORIGINAL  
(Red)

**E. I. DU PONT DE NEMOURS AND COMPANY  
RESPONSE TO REQUEST FOR INFORMATION  
LOWER DARBY CREEK AREA SITE  
CLEARVIEW LANDFILL, FOLCROFT LANDFILL,  
AND FOLCROFT LANDFILL ANNEX**

1. State the name of your company, its mailing address, and telephone number. Further identify:

**E. I. du Pont de Nemours and Company  
1007 Market Street  
Wilmington, DE 19898  
302.774.1000**

- a. The dates and states of incorporation of your company;

**Incorporated in the State of Delaware in September 1915.  
This is the only date and state of incorporation.**

- b. The date and original state of incorporation of your company; and

**Incorporated in the State of Delaware in September 1915.**

- c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

**DuPont is the parent corporation. It is a Fortune 500 company that has been in business for 200 years. During that time, DuPont has been affiliated with many other entities through acquisition or merger. DuPont has also subsequently divested itself of entities. There is no complete listing.**

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? Do or did you own a facility in the area of 34th Street and Grays Ferry Avenue in Philadelphia, Pennsylvania? If so, provide the address of the facility and the years of operation. What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

The DuPont facility in the Philadelphia, Pennsylvania area is the Marshall Laboratory. It is located at 3401 Grays Ferry Avenue, Philadelphia, PA 19146. It occupies 34 acres and has been owned by DuPont since 1917.

ORIGINAL  
10/2/81

Between 1958 and 1976, the Relevant Time Period, the plant produced formic acid, paint and paint related products in addition to conducting research and development. Formic acid operations were closed in the mid 70's. In 1981, the manufacturing plant was closed and dismantled.

The site currently engages in research and development work of automotive paints and has a small polymer semiworks facility on site.

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

Harry Wallace, foreman in the Receiving and Stores Department, employed by DuPont since 1966, currently in Troy, Michigan.

John G. Weldon, Environmental Coordinator, employed by DuPont since 1965, at the Marshall Laboratory.

4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:
  - a. The dates of their operation;
  - b. The nature of their operation; and
  - c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

DuPont has been the owner and operator of the Grays Ferry Road facility since 1917. It was a former paint manufacturing facility but is now solely a research and development facility of paints and resins.

DuPont does not have any historical documents relating to waste generation and disposal at the facility because of compliance with its corporate records retention policy.

The inception of any formal records retention policy at DuPont was in the early 1970's when each department or major business was encouraged, but not required, to develop one. Each plant was left to implement the specifics of these departmental policies. As policies were updated, they superseded anything that may have preceded it. In the mid 1980's, DuPont developed a corporate policy. Over the next two or three years, the various departments adopted the corporate policy and at that time could include an addendum of business specific exceptions to the general policy. With each iteration of the corporate manual, previous editions became obsolete and were discarded. The manual grew in size and became very cumbersome to use. In 1993, new fundamental principles and guidelines for records management applicable company wide were established and a program guide issued.

Waste records are held for three years from time of generation as required by federal and state statutes.

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

We believe the documents generated during the Relevant Time Period of 1958 to 1976 would be similar to the current documents generated with the exception of waste manifests.

- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;

A straight bill of lading was used to ship materials off site. It showed the date of the shipment, the carrier, to whom it was consigned, quantity, weights, contract order number, cost codes, and hazardous material

information. Bills of lading were kept in the Shipping Office.

Contracts and invoices were kept in the Purchasing and Accounting offices.

- b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and

We have no knowledge of any permits, permit applications, or correspondence that would have been in effect and/or generated during the Relevant Time Period.

- c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

For the relevant time period, 1958 - 1976, the Marshall Lab no longer has any records. All have exceeded records retention dates for destruction. See answer to question 4.

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

There were a large number of raw materials used in the manufacturing of formic acid, paints and resins, some hazardous. The Purchasing Department handled all raw material orders. When materials arrived they were stored in the Raw Material Warehouse until requested. All orders, invoices, and related correspondence were maintained by the Purchasing office.

- a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;

Hazardous substances were used in chemical reactions to make resins and formic acid. Other hazardous materials were ingredients in paint mixtures.

CA 1044  
(180)

- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;

Generally speaking, the hazardous substances were either liquid or solid and could be flammable, corrosive, toxic or poisonous. They included monomers, solvent additives, paints, gums, pigments and powders.

- c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;

We no longer have this information per our corporate record retention policy.

- d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;

Hazardous substances in raw materials have always been used on site since its inception in 1917.

- e. The types and sizes of containers in which these substances were transported and stored; and

Most of the raw materials were transported and stored in 55 gallon steel drums for the liquids and solids. Some solids were stored in fiber bags.

- f. The persons or companies that supplied each such hazardous substance to your company.

Many vendors were used in the purchasing of raw materials. Again because of corporate records retention guidelines, records are no longer available for the Relevant Time Period.

- 7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:

- ORIGINAL  
(Red)
- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
  - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
  - c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
  - d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
  - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
  - f. The location and method of treatment and/or disposal of each such by-product or waste.

The manufacture of formic acid resulted in a by-product, aluminum sulfate, which was sold as a commercial product. Wastes generated from the manufacturing of paint and paint products were sludges and residues, wash solvents, off-standard product and, from the laboratory, experimental batches. Paints and paint residues may contain small quantities of some of these hazardous substances; Mercury, Iron, Manganese, Magnesium, Zinc, Cadmium, Copper, Chromium trivalent, Chromium hexavalent, Lead, Fungicides, and Intermediates, Halogenated aliphatics, Acrylates and latex emulsions, Amides, Amines and Imides, Plastizers, Resins, Elastomers, Solvents polar, Solvents halogenated aliphatic, Esters and Ethers, Alcohols, Ketones & Aldehydes, Salts, Mercaptans, Paints and Pigments, and Asbestos. We are unable to answer in any more detail.

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:

ORIGINAL  
(Reg)

- a. The person with whom you made such a contract or arrangement;
- b. The date(s) on which or time period during which such material was removed or transported for disposal;
- c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
- d. The annual quantity (number of loads, gallons, drums) of such material;
- e. The manner in which such material was containerized for shipment or disposal;
- f. The location to which such material was transported for disposal;
- g. The person(s) who selected the location to which such material was transported for disposal;
- h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

DuPont reported on the Eckhardt Survey response for the Philadelphia Plant/Marshall Laboratory its use of Folcroft Landfill. The last date of use was 1967; it does not give the first date.

9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
  - a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
  - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or

- 64  
18001
- c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

**Harry Wallace**  
**Environmental Coordinator**  
**DuPont Performance Coatings**  
**Troy, Michigan**

- 10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
  - a. The date(s) on which such material was disposed of or treated at the Site;
  - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
  - c. The annual quantity (number of loads, gallons, drums) of such material;
  - d. The specific location on the Site where such material was disposed of or treated; and
  - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

**The information necessary to answer this question is unavailable; records no longer exist.**

- 11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
  - a. The date(s) the spill(s)/release(s) occurred;

- 001-140  
10321
- b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
  - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
  - d. The packaging, transportation, and final disposition of the materials which were spilled/released.

**We do not know.**

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

**Harry Wallace**

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

**Not to the best of our knowledge and belief.**

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**DuPont does not have any information to add.**

15. Representative of your establishment(s):

- 04-11-11  
11/11/11
- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

Pamela Meitner, Esq.  
DuPont Legal, D-7099  
1007 Market Street  
Wilmington, DE 19898  
302.774-8720

Barbara U. Gravely  
Corporate Environmental Paralegal  
DuPont Legal, D-7083  
1007 Market Street  
Wilmington, DE 19898  
302.774.4210

John G. Weldon  
Environmental Coordinator  
DuPont Performance Coatings  
Marshall Laboratory  
3401 Grays Ferry Avenue  
Philadelphia, PA 19146

- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Pamela Meitner, Esq.  
DuPont Legal, D-7099  
1007 Market Street  
Wilmington, DE 19898  
302.774-8720

15. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. Your document retention policy;

See attached and answer to question 4.

- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

**Records were believed to be burned when the plant closed in 1981 and facility was dismantled.**

- c. A description of the type of information that would have been contained in the documents; and

**Contracts, shipping papers and invoices**

- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

**We do not know the name of the responsible person.**



E. I. du Pont de Nemours and Company  
Legal, D-7096-2  
1007 Market Street  
Wilmington, Delaware 19898

Nancy A. Sandell  
Sr. Legal Assistant  
(302) 774-4406  
(302) 774-1189 (FAX)  
(800) 248-5260 (FAX)

ORIGINAL  
(Rec)

June 11, 2001

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Ms. Carlyn Prisk  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: Lower Darby Creek Area Site**

Dear Ms. Prisk:

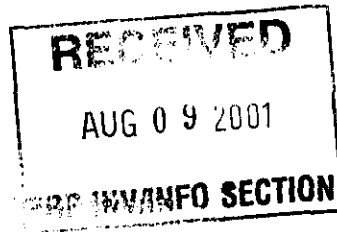
This letter is to confirm our telephone conversation of Monday, June 11, 2001 in which you granted DuPont an extension for its response to EPA's Required Submission of Information. The new due date is June 20, 2001.

Thank you. If you have any concerns, please call me at 302-774-4406.

Sincerely,

Nancy A. Sandell  
Senior Legal Assistant

NAS:dac



ORIGINAL  
(Red)

August 6, 2001

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Ms. Carlyn Prisk (Mail Code 3HS11)  
U. S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103

**Re: Lower Darby Creek Area Site**

Dear Ms. Prisk:

This letter is a response to your inquiries regarding DuPont's answers to the Request for Information for the Lower Darby Creek Area Site. We appreciate the extension of time given to answer.

- I. Are the raw materials in the answer to Question 6 the same as those listed in Question 7's response.

**Generally speaking the answer is, yes, the raw materials in Question 6 are the same substances enumerated in response to Question 7. Raw materials are in the waste.**

**Paint has always been made using a "recipe". Literally thousands of ingredients are in paint and paint products; but, for any individual paint or paint product, the ingredients vary in number and amount to produce the desired final product. It is DuPont's practice to microfilm the "recipe" for the paint and products it has produced. What DuPont doesn't have is a production history to tell us what was made when and where, if it was made once and never again or many times over, if it was made at one manufacturing site and not another. In the relevant time period, paint and paint products were manufactured at many locations throughout the country. There aren't any records to tell us what was produced at the Grays Ferry location.**

**The raw materials in the paint and paint products in many cases are similar today as to what was used during the relevant time period. For example, monomers, polymers, solvents, and pigments are still used. However and to**

**continue the example, pigments have less lead and chromium in them than they did during the relevant time period. We are unable to be anymore specific without referring to the "recipe" for the particular products produced at a particular time at a particular location – e.g. the Grays Ferry site. This is impossible to determine.**

2. Where are the MSDSs for the materials?

**It is not possible to produce MSDSs for raw materials used at Grays Ferry during the time period used the Folcroft Landfill, pre 1967. DuPont does not know what paint and paint products were produced at Grays Ferry during the relevant time period as explained in the answer to Question 1 of this supplemental response. Even if we did know, we would not have the MSDSs for the raw materials; we would have expected the supplier of the raw materials to provide them.**

**MSDSs were not required documentation until 1985, substantially after DuPont's alleged involvement. In the early 1990's, the Company developed an on line archive system for MSDSs, which the businesses are encouraged but not required to use. DuPont Performance Coatings, the business for which the Marshall Lab at Grays Ferry is a facility, does not use the Company system but has developed its own, which does NOT have archiving capability.**

3. Did someone speak to Harry Wallace?

**Yes. Mr. Wallace was interviewed by Barbara Gravely, a paralegal at DuPont. He was unable to add anything new to our understanding of DuPont's business relationship with Folcroft Landfill and the responses to the questions about paint manufacturing at the Grays Ferry site.**

4. Where is the attachment for the Records Retention Policy?

**Enclosed is a copy of DuPont's Record Retention Policy. It was inadvertently omitted at the time of the original submission.**

5. Enclose a copy of the Eckhardt Report.

**Enclosed is a copy of the relevant portions of the requested report.**

Very truly yours,

Pamela Meitner

ORIGINAL  
(Red)

Phone Number: ( ) \_\_\_\_\_

- COMPLETE ONE FORM "B" FOR EACH OF THE SITES

- IF YES, COMPLETE FORM "C"

- IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms ..... 1974 (71-72)
9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms ..... 1950 (73-74)

FORM 3: DISPOSAL SITE INFORMATION

FINAL

(1-8) (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

ORIGINAL (Red)

Company Name: E. I. DU PONT Division/Subsidiary: F. & F.  
 Facility Name: PHILADELPHIA WORKS  
 Name of Site: FOLCROFT LANDFILL CORP.  
 Address of Site: CALCON HOOK ROAD

no. street  
 FOLCROFT PA. 19023  
 city state zip code

Name of Owner (while used by facility):  
 Address:

no. street  
 city state zip code

Current Owner (if different from above):  
 Address:

no. street  
 city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) ..... [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [9] (12)  
 IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... 19[ ] (15-16) \*
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7] (17-18)
6. Total amount of process waste from this facility disposed at site:  
 USE TONS ONLY IF POSSIBLE: thousand gallons ..... [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] (19-26)  
 Right justify response hundred tons ..... [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] (27-33) \*  
 thousand cubic yards ..... [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)  
 landfill, mono industrial waste ..... [9] (42)  
 landfill, mixed industrial waste ..... [2] (43)  
 landfill, drummed waste ..... [2] (44)  
 landfill, municipal refuse co-disposed ... [9] (45)  
 pits/ponds/lagoons ..... [9] (46)  
 deep well injection ..... [3] (47)  
 land farming ..... [3] (48)  
 incineration ..... [9] (49)  
 treatment (eg. neutralizing)..... [9] (50)  
 reprocessing/recycling ..... [3] (51)  
 other (specify) ..... [9] (52)
8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

\* Information on this landfill is only from employee memories. There are no records from which to determine quantities of wastes or the years during which this site was used.

Company Name: DU PONT  
 Division/Subsidiary: F. & F.  
 Facility Name: PHILADELPHIA WORKS  
 Site Name: FOLCROFT LANDFILL CORP.

ORIGINAL  
(Red)

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	1	(22)
iron, manganese, magnesium	1	(23)
zinc, cadmium, copper, chromium (trivalent)	1	(24)
chromium (hexavalent)	1	(25)
lead	1	(26)
Radioactive residues, > 50 pico curies/gram	2	(27)
uranium residuals & residuals for UF <sub>6</sub> recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	1	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	1	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	1	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	1	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	1	(44)
resins	1	(45)
elastomers	1	(46)
solvents polar (except water)	1	(47)
carbon tetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	1	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	1	(54)
alcohols	1	(55)
ketones & aldehydes	1	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	1	(60)
Misc.	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	1	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P <sub>2</sub> , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	1	(68)

EPA REGION III  
SUPERFUND DOCUMENT MANAGEMENT SYSTEM

DOC ID # 395711  
PAGE # 19

IMAGERY COVER SHEET  
UNSCANNABLE ITEM

Contact the CERCLA Records Center to view this document.

SITE NAME	<u>LOWER DARBY CREEK</u>		
OPERABLE UNIT	<u>CC</u>		
SECTION/BOX/FOLDER	<u>2C</u>	<u>Box 6</u>	<u>2.002</u>

REPORT OR DOCUMENT TITLE	<u>104 (E) response</u> <u>- E I Alupont de Nemours Co.</u>		
DATE OF DOCUMENT	<u>June 18, 2001</u>		
DESCRIPTION OF IMAGERY	<u>Corporate Records</u> <u>information management program guide</u>		
NUMBER AND TYPE OF IMAGERY ITEM(S)	<u>Book</u>		